

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

STEWART TITLE GUARANTY COMPANY,

Plaintiff,

v.

LAW OFFICES of DAVID FLEISCHMANN, P.C.,
DAVID FLEISCHMANN, ESQUIRE, ANDREW
SELEVAN, ESQUIRE, and WORLD WIDE LAND
TRANSFER, LLC f/k/a WORLD WIDE LAND
TRANSFER, INC.

Defendants.

CIVIL ACTION NO.:
3:21-cv-16713-FLW-TJB

NOTICE OF MOTION

Filed Electronically

PLEASE TAKE NOTICE, that upon the annexed certification of Joseph L. Francoeur dated October 28, 2021 and the exhibits thereto, the accompanying memorandum of law, and all the prior pleadings and proceedings herein, the undersigned attorneys for Defendants, LAW OFFICES of DAVID FLEISCHMANN, P.C. and DAVID FLEISCHMANN, ESQUIRE, shall move before the Honorable Chief Judge Freda L. Wolfson, U.S.D.J., on December 6, 2021 or on a date to be set by the Court, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) and 9(b) dismissing Plaintiff's Amended Complaint against Defendants, LAW OFFICES of DAVID FLEISCHMANN, P.C. and DAVID FLEISCHMANN, ESQUIRE for failure to state claims upon which relief can be granted, and granting such other, further, and different relief as this Court deems just and proper.

Dated: October 28, 2021

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

By: /s/ Joseph L. Francoeur
Joseph L. Francoeur
Maxx M. Johnson
Attorneys for Defendants
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